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19
20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA**

22
23 TERESA TURNER, INDIVIDUALLY
24 AND ON BEHALF OF ALL OTHERS
25 SIMILARLY SITUATED,

26 Case No. 2:25-CV-00334-FMO-PD

27 Plaintiff,

28 **FED. R. CIV. P. 5.1 NOTICE OF
CONSTITUTIONAL CHALLENGE**

29
30 v.
31 NATIONAL NOTARY
32 ASSOCIATION,

33 Judge: Fernando M. Olguin

34
35 Defendant.

36
37 Pursuant to Fed. R. Civ. P. 5.1, National Notary Association (“NNA”),
38 through its undersigned attorneys, provides this notice of its constitutional challenge
39 of a federal statute:

40 1. On March 7, 2025, the NNA filed a Fed. R. Civ. P. 12(b)(6) motion to
41 dismiss (“Motion”) challenging the constitutionality of the Video Privacy Protection

1 Act, 18 U.S.C. § 2710 (“VPPA”). [ECF No. 14]. The Motion argues that the VPPA
2 facially and as applied violates the First Amendment and the Due Process Clause of
3 the Fifth Amendment of the United States Constitution. *Id.* at 22-25.

4 2. On March 17, 2025, I provided notice to the United States Attorney
5 General by mailing a copy of the Motion by U.S. Certified Mail to:

6 Pam Bondi, Attorney General of the United States
7 U.S. Department of Justice
8 950 Pennsylvania Avenue, NW
9 Washington, DC 20530-0001

10
11 Dated: March 17, 2025

CLARK HILL LLP

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13 By: /s/ Myriah V. Jaworski
14 Myriah Jaworski

15 *Attorneys for Defendant National Notary
16 Association*

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